

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
BANKRUPTCY DIVISION
ST. CROIX**

In re:)	Chapter 11
)	
HOVENSA, L.L.C.,)	Case No. 1:15-bk-10003-MFW
)	
Debtor.)	Re: D.I. 1173 and 1174

**JOINT MOTION FOR ENTRY OF ORDER EXTENDING LIQUIDATING TRUSTEE'S
DEADLINE TO RESPOND TO MOTION FOR DISGORGEMENT OF FEES OR IN
THE ALTERNATIVE MOTION FOR FEE AUDIT OF DENTONS AND WMC**

Lee J. Rohn, on behalf of certain Class IV Tort Claimants and a member of the Oversight Committee of the Liquidating Trust (“Attorney Rohn”) and Jay Borow, in his capacity as the duly appointed liquidating trustee for the Hovensa Liquidating Trust (the “Liquidating Trustee” and collectively with L. Rohn, the “Parties”) jointly file this motion for entry of an order extending the Liquidating Trustee’s deadline to seek summary dismissal of the Motion for Disgorgement of Fees Or, In the Alternative, Motion for Fee Audit of Dentons and WMC filed under seal as Docket Number 1173 (the “Disgorgement Motion”) and, in support hereof, jointly state as follows:

1. At the hearing held on October 11, 2018, the Parties agreed and the Court ordered that Attorney Rohn would file and serve the Disgorgement Motion no later than October 15, 2018. The Court also ruled that the Liquidating Trustee would have fourteen (14) days to file a motion for summary dismissal of the Disgorgement Motion.

2. The Liquidating Trustee did not receive service of the Disgorgement Motion until October 22, 2018. The Parties agree that the appropriate deadline for the Liquidating Trustee to file its motion for summary dismissal of the Disgorgement Motion is November 5, 2018.

WHEREFORE, Attorney Rohn and the Liquidating Trustee jointly request that the Court enter an order in substantially the same form as attached hereto as **Exhibit A**, directing that the Liquidating Trustee shall have until Monday November 5, 2018 to file a motion for summary dismissal of the Disgorgement Motion.

**JOINTLY AND RESPECTFULLY SUBMITTED, THIS ____ DAY OF
OCTOBER, 2018:**

**LEE J. ROHN AND
ASSOCIATES, LLC**

By: _____
Lee J. Rohn (VI Bar No. 52)
1101 King Street
Christiansted, VI 00820
Telephone: (340) 778-8855
Email: lee@rohnlaw.com

Counsel to Certain Class IV Tort
Claimants

HAMM ECKARD, LLP

By: _____
Mark W. Eckard (VI Bar No. 1051)
5030 Anchor Way, Suite 13
Christiansted, VI 00820
Telephone: (340) 773-6955
Email: meckard@usvi.law

Counsel to the Liquidating Trustee

DENTONS US LLP

By: _____
Sam J. Alberts (admitted *pro hac vice*)
Malka Zeefe (admitted *pro hac vice*)
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 408-7004
Email: sam.alberts@dentons.com
malka.zeefe@dentons.com

Counsel to the Liquidating Trustee

